

Temporary Instruction 2515/182

Phase 2 Inspection Requirements

General Instructions

Inspectors should note that some of these questions are based on requirements directly set forth in the initiative while others are not. All of the questions provide information related to whether a licensee is implementing the initiatives in a "committed and enduring fashion". A single or a small number of "negative" responses to these questions would not indicate a lack of commitment to the initiative on the part of licensee. Alternatively, a pattern of "negative" responses, especially a pattern which is inconsistent among many licensees, could be evidence of a lack of commitment.

These questions are to be considered additions to the inspection and reporting requirements of phase 1 and part A of phase 2 (TI paragraph 03.02.a) of the TI. The majority of the questions are asked in a yes / no format. It is, however, desired that inspectors provide amplifying information whenever possible. In all cases, when the extent of a question listed below is excessive when compared to the available resources, a sample of the licensee's program may be used. Sample size is left to the discretion of the inspector. Sample sizes of one item are acceptable when necessary. Although the initiatives address buried piping irrespective of the fluid contained within the piping and underground piping and tanks which are safety related or contain licensed or environmentally sensitive material, for the purpose of the questions which follow, only piping and tanks which are safety related or contain licensed material need be considered.

Providing documentation to support responses is neither necessary nor desired.

		Questions	Response
Question Number	Subpart		
		Initiative Consistency	
1	a	Has the licensee taken any deviations to either of the initiatives?	Yes / No
	b	If so, what deviations have been taken and what is (are) the basis for these deviations?	
2	a	Does the licensee have an onsite buried piping program manager (owner) and, potentially, a staff?	Yes / No
	b	How many buried piping program owners have there been since January 1, 2010?	
	c	How many other site programs are assigned to the buried piping program owner?	
3	a	Does the licensee have requirements to capture program performance, such as system health reports and performance indicators?	Yes / No
	b	Are these requirements periodic or event driven?	Periodic / Event Driven / None
	c	Are there examples where these requirements have been successfully used to upgrade piping systems or to avert piping or tank leaks?	Yes / No
4	a	Does the licensee have a program or procedure to confirm the as-built location of buried and underground piping and tanks at the plant?	Yes / No
	b	Has the licensee used this program?	Yes / No
	c	Was the program effective in identifying the location of buried pipe?	Yes / No

5		For a sample of buried pipe and underground piping and tanks (sample size at least 1 high and 1 low risk/priority pipe or tank), did the risk ranking and/or prioritization process utilized by the licensee produce results in accordance with the initiative guidelines, i.e., which emphasize the importance of components which have a high likelihood and consequence of failure and deemphasize the importance of components which have a low likelihood and consequence of failure?	Yes / No Sample size examined _____
6	a	As part of its risk ranking process did the licensee estimate/determine the total length of buried/underground piping included in the initiatives?	Yes / No
	b	As part of its risk ranking process did the licensee estimate/determine the total length of high risk buried/underground piping included in the initiatives?	Yes / No
		Preventive Actions / System Maintenance	
1	a	For uncoated steel piping, has the licensee developed a technical basis for concluding that structural (e.g. ASME Code minimum wall, if applicable) and leaktight integrity of buried piping can be maintained?	Yes / No / Not Applicable (no uncoated buried steel pipe)
	b	Is the technical basis provided as justification by the licensee consistent with the initiative (including its reference documents) or industry standards (e.g. NACE SP0169)	Yes / No
2	a	For buried steel, copper, or aluminum piping or tanks which are not cathodically protected, has the licensee developed a technical basis for concluding that structural (e.g. ASME Code minimum wall, if applicable) and leaktight integrity of buried piping can be maintained?	Yes / No / Not Applicable (no buried steel, copper, or aluminum piping which is not cathodically protected)

	b	Is the technical basis provided as justification by the licensee consistent with the initiative (including its reference documents) or industry standards (e.g. NACE SP0169)	Yes / No
3	a	For licensees with cathodic protection systems, does the licensee have procedures for the maintenance, monitoring and surveys of this equipment?	Yes / No / Not Applicable (no cathodic protection systems)
	b	Are the licensee procedures consistent with the initiative (including its reference documents) or industry standards (e.g. NACE SP0169)?	Yes / No
	c	Is the cathodic protection system, including the evaluation of test data, being operated and maintained by personnel knowledgeable of, or trained in, such activities	Yes / No
5		Is there a program to ensure chase and vault areas which contain piping or tanks subject to the underground piping and tanks initiative are monitored for, or protected against, accumulation of leakage from these pipes or tanks?	Yes / No / N/A (No piping in chases or vaults)
		Inspection Activities / Corrective Actions	
1	a	Has the licensee prepared an inspection plan for its buried piping and underground piping and tanks?	Yes / No
	b	Does the plan specify dates and locations where inspections are planned?	Yes / No
	c	Have inspections, for which the planned dates have passed, occurred as scheduled or have a substantial number of inspections been deferred?	Occurred as scheduled / Deferred
2	a	Has the licensee experienced leaks and/or significant degradation in safety related piping or piping carrying licensed material since January 1, 2009?	Leaks Yes / No Degradation Yes / No

	b	If leakage or significant degradation did occur, did the licensee determine the cause of the leakage or degradation?	Yes / No
	c	Based on a review of a sample of root cause analyses for leaks from buried piping or underground piping and tanks which are safety related or contain licensed material, did the licensee's corrective action taken as a result of the incident include addressing the cause of the degradation?	Yes / No / N/A (no leaks)
	d	Did the corrective action include an evaluation of extent of condition of the piping or tanks and possible expansion of scope of inspections? (Preference should be given to high risk piping and "significant" leaks where more information is likely to be available).	Yes / No / N/A (no leaks)
3	a	Based on a review of a sample of NDE activities which were either directly observed or for which records were reviewed, were the inspections conducted using a predetermined set of licensee/contractor procedures?	Yes / No
	b	Were these procedures sufficiently described and recorded such that the inspection could be reproduced at a later date?	Yes / No
	c	Were the procedures appropriate to detect the targeted degradation mechanism?	Yes / No
	d	For quantitative inspections, were the procedures used adequate to collect quantitative information?	Yes / No
4		Did the licensee disposition direct or indirect NDE results in accordance with their procedural requirements?	Yes / No
5		Based on a sample of piping segments, is there evidence that licensees are substantially meeting the pressure testing requirements of ASME Section XI IWA-5244?	Yes / No